

MARCH 24, 2020

**VIA CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

**Article No.: 7019 0700 0000 3382 5250**

National FOIA Office  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW (2310A)  
Washington, DC 20460

RE:	Our Client:	Lee Edwards
	Date of Incident:	April 25, 2019
	Location of Incident:	Petro Atlanta Truck Stop 3181 Donald Lee Hollowell Pkwy. Atlanta, GA, 30318

**FREEDOM OF INFORMATION ACT REQUEST**

To Whom It May Concern:

This firm represents Lee Edwards. Mr. Edwards is a professional truck driver who was, on April 25, 2019, parked at the Petro Atlanta Truck Stop, located at 3181 Donald Lee Hollowell Pkwy., Atlanta, GA, 30318 ("the Truck Stop"), when a hydrochloric acid spill occurred ("the Subject Incident"). Mr. Edwards suffered personal injuries, and his truck sustained property damage, as a result of exposure to hydrochloric acid and fumes. Based on the documents produced to us by the Atlanta Fire Rescue Department ("AFRD") (Incident Number: 19025662), we understand that the AFRD reported the incident to your agency.

Accordingly, pursuant to the Freedom of Information Act, 5 U.S.C. § 552, we write to request the below-specified public records related to the Subject Incident. If our request is denied in whole or in part, we ask that you justify all deletions by reference to specific exemptions of the act. We will also expect you to release all segregable portions of otherwise exempt material. We, of course, reserve the right to appeal your decision to withhold any information.

We respectfully request copies of the following:

1. **Your agency's file related to the Subject Incident, including but not limited to:**
  - a. **Copies of any documents the AFRD provided to your agency in connection with the Subject Incident;**

- b. Copies of any documents which identify other governmental agencies which responded to the Subject Incident or which participated in containment or clean-up efforts at the site of the Subject Incident;
- c. Copies of any documents (including memoranda, notes, summaries or other similar materials) that your agency prepared in connection with the Subject Incident;
- d. Copies of any written communications (including electronic communications) between your agency and any other governmental entity or other third-party related to the Subject Incident, or containment or clean-up at the site of the Subject Incident;
- e. Copies of any documents related to any investigation your agency conducted into the cause of the Subject Incident;
- f. Copies of any documents related to any administrative, disciplinary or regulatory action that was recommended to be taken, or actually taken, as a result of the Subject Incident;
- g. Copies of any documents related to your agency's involvement in the containment and clean-up at the site of the Subject Incident;
- h. Copies of any documents related to your agency's environmental assessment of the Subject Incident or the site of the Subject Incident;
- i. Copies of any documents which identify regulations or standards applicable to the transport, containment, or clean-up of hydrochloric acid;
- j. Copies of any documents which identify the state and/or local governmental agencies responsible for maintaining and enforcing regulations and standards applicable to the transport, containment, or clean-up of hydrochloric acid;
- k. Copies of any photographs or videos made or taken in connection with the Subject Incident;
- l. Copies of any interviews, interview notes, recordings or statements made or taken in connection with the Subject Incident; and
- m. Copies of any other departmental records, not specifically listed above, which were prepared in connection with the Subject Incident.

As you know, the Law requires a response within twenty (20) business days of your receipt of this letter.

Should you have any questions, please do not hesitate to contact me at (404) 995-8808. Copies of the requested material can be emailed to [alexandra@friedbonder.com](mailto:alexandra@friedbonder.com). We are prepared to pay reasonable costs related to this request.

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Thank you for your assistance.

Sincerely,  
**FRIED & BONDER, LLC**

A handwritten signature in dark ink, appearing to read 'J. White', is written over a horizontal line.

JOSEPH A. WHITE  
PARTNER

JAW/AM

cc: David Fried, via email only (dfried@friedbonder.com)